

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ROGER WALKER,

Plaintiff(s),

-against-

TARGET CORP.,

Defendant(s).

To the above named Defendant(s)

X

X

Index No.:

Filing Date:

Plaintiff(s) designates

Kings County

as the place of trial

The basis of the venue is

Place of occurrence

SUMMONS

Plaintiff(s) reside(s) at

456 Dekalb Avenue Apt. 7B

Brooklyn, New York 11205

County of **KINGS**

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: June 16, 2021

Defendants' Address:

Stephen R. Chesley, LLC
Attorney for Plaintiff(s)
16 Court Street, Suite 2506
Brooklyn, New York 11241
(718) 522-3055

TARGET CORP.
1000 Nicollet Mall
Minneapolis MN 55403

TARGET CORP.
445 Albee Square West,
BROOKLYN, NY 11201-3016

RUSH TO YOUR INSURANCE COMPANY OR BROKER

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS_____
ROGER WALKER,

X

Plaintiff(s),

COMPLAINT

-against-

TARGET CORP.,

Defendant(s).

X

Plaintiff, by her attorney, Stephen R. Chesley, LLC, complaining of the defendant(s) upon information and belief, hereby alleges as follows:

1. That at all times hereinafter mentioned, plaintiff was and still is a resident of the County of Kings, City and State of New York.

2. That at all times hereinafter mentioned, defendant, TARGET CORP. was and still is a duly organized domestic corporation duly existing under and by virtue of the laws of the State of New York.

3. That at all times hereinafter mentioned, defendant, **TARGET CORP.**, was and still is a duly organized foreign corporation duly existing under and by virtue of the laws of the State of New York.

4. That at all times hereinafter mentioned, defendant, **TARGET CORP.**, conducted a business at premises located at 445 Albee Square West, BROOKLYN, NY 11201-3016, County of Kings, City and State of New York.

5. That at all times hereinafter mentioned, defendant, **TARGET CORP.**, was the owner of the premises located at 445 Albee Square West, BROOKLYN, NY 11201-3016, County of Kings, City and State of New York.

6. That at all times hereinafter mentioned, defendant, **TARGET CORP.**, leased the premises located at 445 Albee Square West, BROOKLYN, NY 11201-3016, County of Kings, City and State of New York.

7. That at all times hereinafter mentioned, defendant, **TARGET CORP.**, operated, managed, maintained and controlled a retail store establishment at the aforesaid location.

8. That at all times hereinafter mentioned, defendant was operating said **store** at the aforementioned location and extended to the public to come into its' store for the purpose of buying merchandise.

9. That at all times hereinafter mentioned, plaintiff had lawfully entered the store as a customer of the defendant for the purpose of purchasing goods.

10. That on or about the 4th day of **November, 2019**, while plaintiff was a lawful invitee at the aforesaid location, by reason of the negligence, carelessness and recklessness of the defendant, its' agents, servants and/or employees, **he** was caused to be seriously injured.

11. That the defendant, its' agents, servants and/or employees were negligent in maintaining, suffering, causing and permitting the aforesaid premises to be in an unsafe traplike and hazardous condition; in permitting and allowing aisles and/areas thereat to be, become and remain in a hazardous and dangerous condition; in letting causing and permitting area to items and display tables to be placed in an improper and dangerous manner; in failing to give proper warning and notice of the foregoing; in causing, suffering and permitting the plaintiff to enter into a position of danger; in subjecting the plaintiff to unusual and unnecessary hazards and danger; in causing, suffering and permitting a condition that brought about the injury of said plaintiff on said premises; in creating a trap; in creating a nuisance and in general being reckless and careless.

12. The defendant had actual or constructive notice of the foregoing.

13. That the foregoing occurrence and resulting injuries were without any contributory negligence on the part of the plaintiff, but were due wholly and solely to the negligence, carelessness and recklessness of the defendant, its' agents, servants and/or employees.

14. That as a result of the foregoing , plaintiff sustained severe and serious bodily injuries; has been caused to suffer physical pain and mental anguish as a result thereof; that some of the injuries may be permanent and the plaintiff has been compelled to submit **himself** for medical, hospital and other care and treatments and to incur monetary loss as a result of **his** injuries and has been prevented from pursuing **his** usual occupation and recreational activities with the same degree of efficiency as prior to the occurrence herein.

21. That the aforesaid occurrence arises from one or more of the exceptions stated in

INDIVIDUAL VERIFICATION

STATE OF NEW YORK }
 } ss.:
 COUNTY OF KINGS }

I, **ROGER WALKER**, being duly sworn, deposes and says:

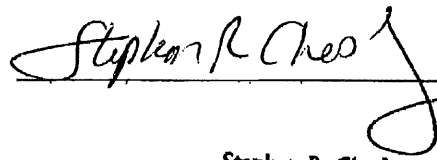
I am the plaintiff in the within action; I have read the foregoing **SUMMONS AND COMPLAINT** and know the contents thereof; stated to be alleged on information and belief, and as to those matters I believe them to be true.



ROGER WALKER

STATE OF NEW YORK, COUNTY OF KINGS ss.:

On the 16 day of June, 2021, before me personally came and appeared, **ROGER WALKER** to me known and known to me to be the individual(s) described in and who executed the foregoing instrument, and who duly acknowledged to me that (s)he executed the same.



 Stephen R. Chesley
 No. 30-4768697
 Qualified in Nassau County
 Commission Expires April 30, 2022

FILED: KINGS COUNTY CLERK 06/16/2021 12:40 PM

INDEX NO. 514542/2021

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 06/16/2021

Index No.:

Year

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

ROGER WALKER,

Plaintiff(s),

-against-

TARGET CORP.,

Defendant(s).

SUMMONS AND VERIFIED COMPLAINT

STEPHEN R. CHESLEY, LLC
Attorneys for Plaintiff(s)
16 Court Street, Suite 2506
Brooklyn, New York 11241
(718) 522-3055

§ CERTIFICATION PURSUANT TO 22 N.Y.C.R.R. § 130-1.1a

STEPHEN R. CHESLEY, hereby certifies that, pursuant to 22 n.y.c.r.r. § 130-1.1a, the foregoing **SUMMONS AND COMPLAINT** are not frivolous nor frivolously presented.

Dated: Brooklyn, New York

STEPHEN R. CHESLEY

AFFIDAVIT OF SERVICE THROUGH THE SECRETARY OF STATE

SUPREME COURT

Purchased/Filed: June 16, 2021

STATE OF NEW YORK, COUNTY OF KINGS

Index # 514542/2021

Roger Walker

Plaintiff

against

Target Corp.

Defendant

STATE OF NEW YORK
COUNTY OF ALBANY

SS.: _____

James Perone, being duly sworn, deposes and says: deponent is over the age of eighteen (18) years; that on _____ June 21, 2021, at 11:00 AM, at the office of the Secretary of State of the State of New York in the City of Albany, New York deponent served the annexed

Summons and Complaint

on

Target Corporation (fict) Target Stores s/h/a Target Corp, the Defendant in this action, by delivering to and leaving with _____ Sue Zouky, AUTHORIZED AGENT in the Office of the Secretary of State, of the State of New York, personally at the Office of the Secretary of State of the State of New York, 99 Washington Avenue, Albany, NY, 2 true copies thereof and that at the time of making such service, deponent paid said Secretary of State a fee 40 dollars; That said service was made pursuant to Section 306 Business Corporation Law. Deponent further says that deponent knew the person so served as aforesaid to be the agent in the Office of the Secretary of State of the State of New York, duly authorized to accept such service on behalf of said defendant

Description of the person served: Approx. Age: 55-60 Approx. Wt: 125lbs Approx. Ht: 5'1

Color of skin: White Hair color: Red/Blonde Sex: Female Other: _____

Sworn to before me on this

21st day of June 2021

SCOTT SCHUSTER
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01SC8308636
QUALIFIED IN ALBANY COUNTY
COMMISSION EXPIRES JULY 28, 2022

James Perone

Attny's File No.

Invoice/Work Order # S1861586

SERVICO, INC.. P.O. BOX 871. ALBANY. NY 12201